

**FILED**

**SEP 18 2013**

CLERK, U.S. DISTRICT COURT  
DISTRICT OF NEVADA

BY \_\_\_\_\_ DEPUTY

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RONALD DAVID KIRSH,

Defendant.

) CRIMINAL INFORMATION

) VIOLATION:

) 18 U.S.C. § 2422(a) – Transportation with  
) Intent to Engage in Criminal Sexual  
) Activity

) 2:13-cr-00348-JAD-PAL

**THE UNITED STATES ATTORNEY CHARGES THAT:**

**COUNT ONE**

Between on or about October 31, 2012, and on or about June 12, 2013, in the State and  
Federal District of Nevada,

**RONALD DAVID KIRSH,**

defendant herein, did use a facility of interstate commerce to knowingly transport, and attempt to  
knowingly transport an individual to engage in any sexual activity for which any person can be  
charged with a criminal offense under federal, state and local law, in violation of Title 18, United  
States Code, Section 2422(a).

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**FORFEITURE ALLEGATION ONE**

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2       1.     The allegations contained in Count One of this Criminal Information are hereby  
3 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
4 Title 18, United States Code, Section 2428(a)(1).

5       2.     Upon conviction of the felony offense charged in Count One of this Criminal  
6 Information,

7                               RONALD DAVID KIRSH,  
8 defendant herein, shall forfeit to the United States of America any property, real or personal, that  
9 was used or intended to be used to commit or to facilitate the commission of a violation of Title  
10 18, United States Code, Section 2422(a):

- 11           a)     an Apple iPhone 4 SN C39GXVFEDT9V;  
12           b)     an iPad 64GB, SN DN6FP5R2DFJ3 with case, keyboard and stylus;  
13           c)     2006 Toyota Avalon 4-door VIN #4T1BK36B76U065325;  
14           d)     A Black A&S computer black tower SN H720510917;  
15           e)     A Black A&S computer black tower SN 16282025800679;  
16           f)     A 1GB thumb drive blue;  
17           g)     A Hitachi 160 GB internal hard drive SN Z2274RMN;  
18           h)     Aptiva 4GB USB thumb drive;  
19           i)     A Sony VAIO SN C3LLZBNV; and  
20           j)     2 Apple iPhones with unknown serial numbers.

21       All pursuant to Title 18, United States Code, Sections 2422(a) and 2428(a)(1).

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**FORFEITURE ALLEGATION TWO**

1. The allegations contained in Count One of this Criminal Information are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2428(a)(2).

2. Upon conviction of the felony offense charged in Count One of this Criminal Information,

RONALD DAVID KIRSH,  
defendant herein, shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of a violation of Title 18, United States Code, Section 2422(a):

- a) an Apple iPhone 4 SN C39GXVFEDT9V;
- b) an iPad 64GB, SN DN6FP5R2DFJ3 with case, keyboard and stylus;
- c) 2006 Toyota Avalon 4-door VIN #4T1BK36B76U065325;
- d) A Black A&S computer black tower SN H720510917;
- e) A Black A&S computer black tower SN 16282025800679;
- f) A 1GB thumb drive blue;
- g) A Hitachi 160 GB internal hard drive SN Z2274RMN;
- h) Aptiva 4GB USB thumb drive;
- i) A Sony VAIO SN C3LLZBNV; and
- j) 2 Apple iPhones with unknown serial numbers.

All pursuant to Title 18, United States Code, Sections 2422(a) and 2428(a)(2).

**FORFEITURE ALLEGATION THREE**

1. The allegations contained in Count One of this Criminal Information are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to

Title 18, United States Code, Section 2428(b)(1)(A) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the felony offense charged in Count One of this Criminal Information,

RONALD DAVID KIRSH,  
defendant herein, shall forfeit to the United States of America any property, real or personal, used or intended to be used to commit or to facilitate the commission of a violation of Title 18, United States Code, Section 2422(a):

- a) an Apple iPhone 4 SN C39GXVFEDT9V;
- b) an iPad 64GB, SN DN6FP5R2DFJ3 with case, keyboard and stylus;
- c) 2006 Toyota Avalon 4-door VIN #4T1BK36B76U065325;
- d) A Black A&S computer black tower SN H720510917;
- e) A Black A&S computer black tower SN 16282025800679;
- f) A 1GB thumb drive blue;
- g) A Hitachi 160 GB internal hard drive SN Z2274RMN;
- h) Aptiva 4GB USB thumb drive;
- i) A Sony VAIO SN C3LLZBNV; and
- j) 2 Apple iPhones with unknown serial numbers.

All pursuant to Title 18, United States Code, Section 2422(a); and Title 18, United States Code, Section 2428(b)(1)(A) and Title 28, United States Code, Section 2461(c).

**FORFEITURE ALLEGATION FOUR**

1. The allegations contained in Count One of this Criminal Information are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to

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1 Title 18, United States Code, Section 2428(b)(1)(B) and Title 28, United States Code, Section  
2 2461(c).

3 2. Upon conviction of the felony offense charged in Count One of this Criminal  
4 Information,

5 RONALD DAVID KIRSH,  
6 defendant herein, shall forfeit to the United States of America any property, real or personal, that  
7 constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code,  
8 Section 2422(a):

- 9 a) an Apple iPhone 4 SN C39GXVFEDT9V;
- 10 b) an iPad 64GB, SN DN6FP5R2DFJ3 with case, keyboard and stylus;
- 11 c) 2006 Toyota Avalon 4-door VIN #4T1BK36B76U065325;
- 12 d) A Black A&S computer black tower SN H720510917;
- 13 e) A Black A&S computer black tower SN 16282025800679;
- 14 f) A 1GB thumb drive blue;
- 15 g) A Hitachi 160 GB internal hard drive SN Z2274RMN;
- 16 h) Aptiva 4GB USB thumb drive;
- 17 i) A Sony VAIO SN C3LLZBNV; and
- 18 j) 2 Apple iPhones with unknown serial numbers.

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1 All pursuant to Title 18, United States Code, Sections 2422(a); and Title 18, United  
2 States Code, Section 2428(b)(1)(B) and Title 28, United States Code, Section 2461(c).

3 DATED: this 18<sup>th</sup> day of September, 2013.

4 DANIEL G. BOGDEN  
5 United States Attorney

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7 ROGER YANG  
8 Assistant United States Attorney  
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